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**Cc:** James D. Elliott[jelliott@spilmanlaw.com]  
**From:** Sarah D. Stoner  
**Sent:** Wed 8/9/2017 8:23:54 PM  
**Subject:** Docket No. EPA-HQ-OAR-2010-0505 - Comments of the Independent Producers  
[Independent Producers' Comments on Proposed Two-Year Stay.pdf](#)

Please find attached the Comments on behalf of the Independent Petroleum Association of America ("IPAA"), American Exploration & Production Council ("AXPC"), Domestic Energy Producers Alliance ("DEPA"), Eastern Kansas Oil & Gas Association ("EKOGA"), Illinois Oil & Gas Association ("IOGA"), Independent Oil and Gas Association of West Virginia, Inc. ("IOGA-WV"), Indiana Oil and Gas Association ("INOGA"), International Association of Drilling Contractors ("IADC"), Kansas Independent Oil & Gas Association ("KIOGA"), Kentucky Oil & Gas Association ("KOGA"), Michigan Oil and Gas Association ("MOGA"), National Stripper Well Association ("NSWA"), North Dakota Petroleum Council ("NDPC"), Ohio Oil and Gas Association ("OOGA"), Oklahoma Independent Petroleum Association ("OIPA"), Pennsylvania Independent Oil & Gas Association ("PIOGA"), Texas Alliance of Energy Producers ("Texas Alliance"), Texas Independent Products & Royalty Owners Association ("TIPRO"), and West Virginia Oil and Natural Gas Association ("WVONGA") (collectively, "Independent Producers") regarding the EPA's Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources: Stay of Certain Requirements at 82 Fed. Reg. 27,645 (June 16, 2017), Docket No. EPA-HQ-OAR, 2010-0505, which was electronically submitted today at [regulations.gov](http://regulations.gov).

Please note that the Comments include attachments of the Petition for Reconsideration and Comments previously submitted by the Independent Producers.

Please contact the undersigned if you have any problems opening this document.  
 Thank you.

*Sent on Behalf of*

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